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BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

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JUL 15 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of the Commission's) PR Docket No 92-257
Rules Concerning Maritime) RM-7956
Communications) RM-8031

To: The Commission

RESPONSE TO COMMENTS

WJG Maritel and Gulf Coast Maritel dba "Marine Telephone Company",
herewith submits its response to reply comments to the Notice of Proposed
Rulemaking and Notice of Inquiry to review the policies and regulations governing
maritime communications.

1. Digital Selective Calling as the Only Authorized Protocol

Para 15(d) of the proposed rule making and notice of inquiry asks if DSC should
be declared the only selected calling technique. No differentiation was made between
emergency signaling and telephone interconnect. International agreements call for a
single DSC standard for safety. They do not require the DSC standard for telephone
interconnect. Other countries, most notably Australia have national systems which
support DSC for safety but do not utilize the DSC protocol for telephone interconnect.
While a single international standard for safety makes sense, a mandated single standard
for telephone interconnect does not.

Several respondents have commented that DSC should be the mandated
telephone interconnect protocol. Some have a specific agenda while others seem to be
agreeing to DSC by default as they know of no other way to gain automatic interconnect
with the PSTN.

Ross Engineering and Global Maritime Communications Systems would mandate DSC as the only PSTN interconnect protocol. Further they would have the Commission require all public coast stations subscribe and subordinate their operations to a "national VHF Maritime Coast Station Service." This implies that either the Commission will create and control such a service or they will. Ostensibly such service would allow for universal registration and consolidated billing for interconnected calls. The establishment of a government agency or government directed exclusive agency for such services would set a new and dangerous precedent in the telecommunications industry. For regular PSTN land telephone calls no such precedent exists. Registration and consolidated billing services are provided by private enterprise in a free market. Anyone who uses a telephone credit card away from home knows that this free market system works quite well. The Commission ought not create or authorize the creation of such an exclusive service.

Ross and Global argue that cellular provides service to boaters by default. We disagree. The increase in marine cellular use is cost motivated. It is not just former VHF radio telephone users shifting to cellular, but also non callers attracted by the extraordinary low cost of cellular service. On a per minute basis, cellular service is offered in many areas for a fraction of the customary rates required for VHF radio telephone. In some local markets cellular unlimited free air time is offered on weekends. The introduction of automatic PSTN switched service will not reduce the number of cellular marine callers if such service is not price competitive. Demand for other services like VTS alarm/monitoring, FAX, packet data, privacy and position locating services will also be price sensitive. If public coast stations cannot provide automatic switched PSTN interconnect service at competitive rates, such services will never be offered.

The DSC protocol for automatic switching to the PSTN poses several technical and economic difficulties for public coast stations. It will require additional transceivers, cabling and antennas for channel 70. These require capital to make the initial installations and significant increases in operating expenses for tower rentals, utilities and

connecting phone circuits. The protocol does not address the potential conflict among adjacent stations for single calls from vessels between stations. The DSC format is fixed and does not allow for enough information to be transferred to complete a billable call.

Mandating the DSC protocol for automatic interconnect to the PSTN will increase costs and add significant burdens to the already threatened public coast stations. Instead of improving the competitive position of public coast stations, it will further imbalance it. As stated in the Ohio River Company and WLO comments such continued imbalance will result in the continued demise of VHF public coast station service.

DSC is not the proven and reliable solution for automatic PSTN interconnect that some would argue. While it has been demonstrated in one market for a very limited number of mobile units, such demonstration falls short of proving that DSC could adequately meet the future needs of all VHF markets in the nation. It did not operate over multiple contiguous stations with different operators nor did it adequately solve the real world problem of collecting the revenue derived from calls placed on the system. Completing a few calls is only part of the task. Collecting the necessary revenue is quite another.

Ross, Global, SEA, NMEA and Ohio River argue for DSC as the required protocol also to support the perceived need for all vessels to move to all markets on all waterways and utilize the same protocol for automatic PSTN interconnect. This is not necessary as the overwhelming majority of recreational and commercial users operate in distinct regional markets. Only a slight minority of vessels are even capable of operating on all waterways. Small craft cannot and do not operate at sea. Deep water craft cannot navigate shallow inland or coastal waterways. River towboats cannot operate in open waters. Instead, each type of craft operates within local or regional markets. The overwhelming majority of vessels - small recreational boats - rarely if ever leave their immediate home port coverage areas. Most commercial vessels operate in distinct markets - riverboats stay on rivers and coastwise vessels go from port to port. The need

for a unified national system for automatic PSTN interconnect is illusory.

Rather than mandate DSC as the only protocol, the Commission should allow each coast station to equip and provide service for the protocol of their choice. If they can develop and implement alternative protocols and equip potential customers to accommodate their protocol they should be allowed to do so. The market place will dictate what works by the level of acceptance and use.

2. Trunking

Respondent comments regarding the issue of trunking seem to overlook a key fact that will impact any decision to allow for trunking. Most of the available public correspondence channels have been allocated and licensed. On most waterways where there is public correspondence traffic for public coast stations, there are no more channels that can be assigned. This is due to the existing regulations which require minimal separation distances between stations. Also, there are only a few public coast stations authorized to operate on more than two separate channels. These are in major port areas such as Memphis, Miami and New Orleans. The rule is one or perhaps two channels per station.

With this in mind, trunking can only be accomplished (1) in those few ports where there are multiple channels or (2) with a change in the rules requiring minimum distances between stations. Congestion however can and does occur on public correspondence channels whenever one more vessel than the number of available channels desires to place a call. If the public coast station operator however does have multiple contiguous stations with multiple channels, they could use trunking to use channels throughout their service area to meet needs immediately as they arise. This is an entirely practical alternative to current practices especially in today's market where most public coast station operators use centralized control centers to manage contiguous stations. While the rules were promulgated to avoid interference between adjacent individual coast

station operators, they serve now to deny multiple station operators the opportunity to efficiently use their assigned channels within their operating areas.

Trunking is possible, will reduce congestion and lead to more efficient use of spectrum. However it cannot succeed if it is only allowed in those few locations where there are three or more authorized public correspondence channels. It will succeed if public coast station operators are allowed to trunk all of their assigned channels throughout their assigned contiguous areas.

Respectfully submitted,

WJG MARITEL CORPORATION AND
GULF COAST MARITEL CORPORATION
DBA MARINE TELEPHONE COMPANY

July 15, 1993

By:

A handwritten signature in dark ink, appearing to read "John M. Ballenger", is written over a horizontal line. The signature is fluid and cursive.